

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**ROGER KNOX, WINTERCAP S.A.,
MICHAEL T. GASTAUER, WB21 US
INC., SILVERTON SA INC., WB21 NA
INC., C CAPITAL CORP., WINTERCAP
SA INC. AND B2 CAP INC.**

Defendants.

**RAIMUND GASTAUER, SIMONE
GASTAUER FOEHR, AND B21 LTD.
Relief Defendants.**

Civil Action No. 18-CV-__ ()

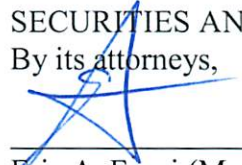
**PLAINTIFF'S NOTICE OF MOTION AND EMERGENCY *EX PARTE*
MOTION FOR A TEMPORARY RESTRAINING ORDER,
ORDER FREEZING ASSETS AND ORDER FOR OTHER EQUITABLE RELIEF**

Pursuant to Fed. R. Civ. P. 65(b), plaintiff United States Securities and Exchange Commission (the "Commission" or "SEC") hereby files this emergency motion, *ex parte*, for entry of a temporary restraining order, order freezing assets, and order for other equitable relief as to defendants Roger Knox, Wintercap SA, Michael T. Gastauer, WB21 US. Inc., Silverton SA Inc., WB21 NA Inc., C Capital Corp., Wintercap SA Inc., and B2 Cap Inc., and an order freezing assets and an order for other equitable relief as to Relief Defendants Raimund Gastauer, Simone Gastauer Foehr, and B21 Ltd. A proposed form of Order is attached hereto. In support of this motion, the Commission submits the accompanying memorandum of law, the declaration of Trevor Donelan and related Exhibits.

WHEREFORE, the Commission respectfully requests that the Court enter the Temporary Restraining Order, Order Freezing Assets and Order for Other Equitable Relief filed herewith.

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION
By its attorneys,



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